

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

OCT 24 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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In the Matter of)
Petition of WorldCom, Inc. Pursuant)
to Section 252(e)(5) of the)
Communications Act for Expedited)
Preemption of the Jurisdiction of the)
Virginia State Corporation Commission)
Regarding Interconnection Disputes)
with Verizon Virginia Inc., and for)
Expedited Arbitration)

CC Docket No. 00-218

In the Matter of)
Petition of AT&T Communications of)
Virginia Inc., Pursuant to Section 252(e)(5))
of the Communications Act for Preemption)
of the Jurisdiction of the Virginia)
Corporation Commission Regarding)
Interconnection Disputes With Verizon)
Virginia Inc.)

CC Docket No. 00-251

**VERIZON VIRGINIA INC.'S MOTION FOR LEAVE TO FILE REPLY
IN SUPPORT OF MOTION TO STAY**

Verizon Virginia Inc ("Verizon VA") hereby moves for leave to file the enclosed reply to the Opposition of WorldCom, Inc. ("WorldCom") and AT&T Communications of Virginia, LLC ("AT&T") to Verizon VA's Motion for Stay.

The circumstances here support affording Verizon VA the opportunity to file a brief reply. As Verizon VA explains in its reply, a stay is even more warranted now than when Verizon VA filed its motion. The parties' compliance filings are due in four days (October 28), and the rates may become effective not long thereafter. In addition, not only are CLECs citing the Bureau's orders in this proceeding as authoritative Commission precedent, but courts are now interpreting those orders as binding. Moreover, a reply is necessary so that Verizon VA can

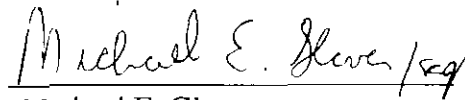
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correct AT&T/WorldCom's claim that the *Order* does not reduce rates to any significant degree; to the contrary, the *Order* will significantly reduce Verizon VA's UNE rates across the board. Finally, permitting Verizon VA to file the attached reply will harm no party.

For the foregoing reasons, Verizon VA's Motion For Leave to File should be granted.

Respectfully submitted,

A handwritten signature in cursive script that reads "Michael E. Glover" followed by a slanted line and the letters "sq".

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Dated. October 24, 2003

CERTIFICATE OF SERVICE

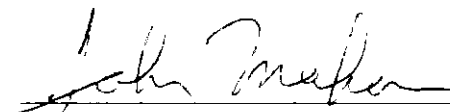
I do hereby certify that true and accurate copies of the foregoing, Verizon's Motion for Leave to File Reply in Support of Motion to Stay, were served by hand delivery via courier this 24th day of October, 2003, to

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